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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM CORBETT,

Defendant.

No. 3:24-cr-00093-SLG-KFR

COUNT 1:

EMBEZZLEMENT AND THEFT FROM  
AN INDIAN TRIBAL ORGANIZATION  
Vio. of 18 U.S.C. § 1163

COUNTS 2–6:

WIRE FRAUD  
Vio. of 18 U.S.C. § 1343

COUNT 7–11:

AGGRAVATED IDENTITY THEFT  
Vio. of 18 U.S.C. § 1028A

CRIMINAL FORFEITURE

ALLEGATION:

18 U.S.C. § 981(a)(1)(C), 28 U.S.C. §  
2461(c), and Fed. R. Crim. P. 32.2(a)

**INDICTMENT**

The Grand Jury charges that:

## INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Curyung Tribal Council was a federally recognized tribe and Indian Tribal Organization traditionally occupying and using lands in and around Dillingham, Alaska.

2. Defendant WILLIAM CORBETT was a resident of Dillingham, Alaska, and was employed as Accountant/IT Specialist of Curyung Tribal Council.

3. As an Accountant/IT Specialist, WILLIAM CORBETT was the only employee responsible for overseeing the tribe's finances; he had access to, and control over, Curyung Tribal Council's accounting software data, financial accounts, payroll information, credit cards, and checkbooks.

4. To be valid, checks issued by Curyung Tribal Council must have been signed by at least two authorized signors, who included the seven council members and the tribal administrator but did not include WILLIAM CORBETT.

5. Between on or about October 6, 2023, and continuing until at least February 21, 2024, within the District of Alaska, WILLIAM CORBETT stole and fraudulently acquired more than \$94,000 belonging to Curyung Tribal Council through various means.

6. For example, WILLIAM CORBETT, without authorization, unlawfully issued checks from Curyung Tribal Council's account, and payable to himself and businesses under his control, by forging the signatures of authorized signors.

7. In other cases, WILLIAM CORBETT, fabricated invoices and payroll documents using the personal identifiers of two individuals, to wit: T.T. and E.N., and caused direct

deposits to be made from Curyung Tribal Council's accounts to accounts WILLIAM CORBETT controlled.

COUNT 1

8. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

9. Between on or about October 6, 2023, and continuing until at least February 21, 2024, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to his own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Curyung Tribal Council, an Indian Tribal Organization.

All of which is in violation of 18 U.S.C. § 1163.

COUNTS 2–6

10. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

11. Between on or about October 6, 2023, and continuing until at least February 21, 2024, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly, and with the intent to defraud, devise, and intend to devise a scheme and artifice to defraud as to a material matter, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and by concealment of material facts.

12. For the purpose of executing such scheme and artifice and attempting to do so, the defendant did transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs and signals, to wit, the following direct deposits from First National Bank Alaska, headquartered in Anchorage, Alaska, to Robinhood Financial LLC, headquartered in Menlo Park, California and Capital One, headquartered in McLean, Virginia:

<b>Count</b>	<b>Date</b>	<b>Named Payee</b>	<b>Amount</b>
2	October 9, 2023	Victim 1	\$2,121.14
3	October 9, 2023	Victim 1	\$2,121.16
4	October 9, 2023	Victim 1	\$2,121.14
5	October 20, 2023	Victim 1	\$2,001.39
6	October 20, 2023	Victim 2	\$2,249.70

All of which is in violation of 18 U.S.C. § 1343.

COUNT 7

13. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

14. On, October 9, 2023, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud in violation of 18 U.S.C. § 1343 as charged in Count 2, knowing that the means of identification belonged to another actual person.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 8

15. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

16. On, October 9, 2023, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud in violation of 18 U.S.C. § 1343 as charged in Count 3, knowing that the means of identification belonged to another actual person.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 9

17. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

18. Between on or about October 6, 2023, and continuing until at least February 21, 2024, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud in violation of 18 U.S.C. § 1343 as charged in Count 4, knowing that the means of identification belonged to another actual person.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 10

19. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

20. Between on or about October 6, 2023, and continuing until at least February 21, 2024, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud in violation of 18 U.S.C. § 1343 as charged in Count 5, knowing that the means of identification belonged to another actual person.

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 11

21. Paragraphs 1 through 7 of the Introductory Allegations section of this Indictment are realleged and fully incorporated herein by reference.

22. Between on or about October 6, 2023, and continuing until at least February 21, 2024, at or near Dillingham, Alaska, within the District of Alaska, the defendant, WILLIAM CORBETT, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud in violation of 18 U.S.C. § 1343 as charged in Count 5, knowing that the means of identification belonged to another actual person.

All of which is in violation of 18 U.S.C. § 1028A.

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### CRIMINAL FORFEITURE ALLEGATION

23. The allegations contained in Counts 2 through 11 of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

24. Upon conviction of any of the felony offenses charged in Counts 2 through 11 of this Indictment, the defendant, WILLIAM CORBETT, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 1343 and 1028A, including but not limited to an in personam criminal forfeiture money judgment equal to the value of the property.

25. If any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant.

All pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 21 U.S.C. § 853(p).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Seth Brickey  
SETH BRICKEY  
Assistant U.S. Attorney  
United States of America

s/ Kate Vogel for  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: August 20, 2024